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United States Attorney Southern District of New York

> pheanted CAMPERTA

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

January 29, 2020

BY ECF

The Honorable P. Kevin Castel United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Tucker, 16 Cr. 91 (PKC)

Dear Judge Castel:

The Government respectfully requests until March 2, 2020 to file motions in response to the amended petition filed by Kim Tucker contesting forfeiture orders entered in this case.

Pursuant to the Court's endorsement of the Government's proposed discovery schedule, all motions in relation to Kim Tucker's original petition filed in June 2019 were to be submitted thirty (30) days after the close of fact discovery, which is February 3, 2020 (ECF No. 404). The Government expected to file a motion to dismiss and/or for summary judgment to dismiss Kim Tucker's original petition. However, in light of Kim Tucker's recent filing of an amended petition on January 24, 2020 (ECF No. 424), the Government respectfully requests until March 2, 2020 to file any dispositive motions.

The Government has consulted with Kim Tucker and she has no objection to the Government's request.

Respectfully submitted,

GEOFFREY S. BERMAN United States Attorney

Sagar K. Ravi

Assistant United States Attorney

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cc: Kim Tucker (via Email)